

FOX ROTHSCHILD LLP
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Attorneys for Defendants
Planned Security Services, Inc. and
The Planned Companies, Inc.
By: Suzanne J. Ruderman (SJR/1111)

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

PHILIP MORDI, Individually and On Behalf of
All Other Persons Similarly Situated,

Plaintiff(s),

vs.

PLANNED SECURITY SERVICES, INC. and
THE PLANNED COMPANIES, INC.,

Defendants.

Civil Action No. 07 cv 7192 (GBD)

Electronically Filed

**NOTICE OF MOTION TO TRANSFER
VENUE**

TO: Fran Rudich, Esq.
Locks Law Firm
110 East 55th Street
New York, NY 10022

PLEASE TAKE NOTICE that as soon thereafter as counsel may be heard in the United States District Court for the Southern District of New York, 40 Foley Square, Room 410, New York, New York 10007, that Defendants Planned Security Services, Inc. and The Planned Companies, Inc. (hereinafter collectively referred to as "Defendants"), by and through its undersigned attorneys, shall move pursuant to 28 U.S.C. § 1404 before the Honorable George B.

Daniels, U.S.D.J., as soon as counsel may be heard, for an Order transferring this matter to the District of New Jersey.

PLEASE TAKE FURTHER NOTICE that in support of this Motion, Defendants shall rely upon the accompanying Affidavit of Dino Iuliano and the supporting memorandum of law.

PLEASE TAKE FURTHER NOTICE that Defendants hereby request oral argument if this Motion is opposed.

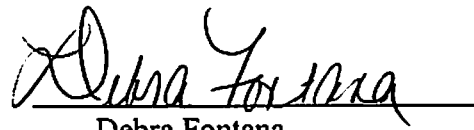
FOX ROTHSCHILD LLP
Attorneys for Defendants
Planned Security Services, Inc. and
The Planned Companies, Inc.

By: /s/ Suzanne J. Ruderman
Suzanne J. Ruderman (SJR/1111)

Dated: October 8, 2007

CERTIFICATE OF SERVICE

I hereby certify that on October 8, 2007, the foregoing Notice of Motion to Transfer Venue was filed with the Clerk of the Court and served in accordance with the Federal Rules of Civil Procedure, and/or the Southern District's Local Rules, and/or the Southern District's Rules on Electronic Service upon the following parties and participants: Fran Rudich, Esq., Locks Law Firm, 110 East 55th Street, New York, NY 10022, Attorneys for Plaintiff.


Debra Fontana

Dated: October 8, 2007